

## EXHIBIT G

### Defendant Virtumundo, Inc.'s First Set of Interrogatories and Requests for Production to Plaintiff Omni Innovations, LLC

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5                   **UNITED STATES DISTRICT COURT**  
6                   **WESTERN DISTRICT OF WASHINGTON**  
7                   **AT SEATTLE**

8 JAMES S. GORDON, Jr., a married  
9 individual, d/b/a  
10 'GORDONWORKS.COM'; OMNI  
11 INNOVATIONS, LLC, a Washington  
12 limited liability company;

13                   **Plaintiffs,**

14                   v.

15 VIRTUMUNDO, INC., a Delaware  
16 corporation d/b/a  
17 ADKNOWLEDGEEMAIL.COM;  
18 ADKNOWLEDGE, INC., a Delaware  
19 corporation, d/b/a  
ADKNOWLEDGEEMAIL.COM;  
SCOTT LYNN and individual and his  
marital community; and JOHN DOES  
I-X,

20                   **Defendants.**

21                   **NO. CV06-0204JCC**

22                   **PLAINTIFF OMNI'S ANSWERS  
AND RESPONSES TO DEFENDANT  
VIRTUMUNDO'S FIRST  
INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS TO OMNI**

23 Plaintiff Gordon answers Defendant Virtumundo's First Interrogatories and Requests For  
24 Production of Documents as follows:

25                   **GENERAL OBJECTIONS**

- 26                   1. Plaintiff objects to each interrogatory to the extent that it seeks material or  
information that is privileged as an attorney-client communication. This objection  
hereinafter will be referred to as the "**Attorney-Client Privilege Objection.**"  
2. Plaintiff objects to each interrogatory to the extent that it seeks material or  
information prepared by or developed at the direction of counsel insofar as it is